

To: Butterfield, Benjamin W.[BButterfield@mofo.com]; Marines, Jennifer L.[JMarines@mofo.com]
Cc: donald.frankel@usdoj.gov[donald.frankel@usdoj.gov]; Zizila, Frances[Zizila.Frances@epa.gov]; Flanagan, Sarah[Flanagan.Sarah@epa.gov]; Kate Barfield - NOAA Federal[kate.barfield@noaa.gov]; Donohue, Brian (ENRD)[Brian.Donohue@usdoj.gov]; Laura Rowley[Laura.Rowley@usdoj.gov]; Mark Barash[mark.barash@sol.doi.gov]; Orris, Karissa[Orris.Karissa@epa.gov]
From: Gordon, David L. (ENRD)
Sent: Wed 1/11/2017 9:21:35 PM
Subject: RE: Confidential - Maxus Revised Plan and Disclosure Statement

Ben and Jen,

Please send a calendar invite to all those copied on this email and me. Most will be able to attend.

We assume participation will be limited to representatives of the Debtors and federal government. I wanted to take this opportunity to provide you contact information for counsel for New Jersey and Ohio for this matter.

For New Jersey:

John F. Dickinson, Jr.

Assistant Chief, Deputy Attorney General

(609) 984-4863

John.Dickinson@dol.lps.state.nj.us

For Ohio:

Michael E. Idzkowski

Principal Assistant Attorney General

Environmental Enforcement Section
Office of Ohio Attorney General Mike DeWine
Office number: 614-752-9563
Fax number: 614-644-1926
michael.idzkowski@OhioAttorneyGeneral.gov

We are still in the process of determining who the contact will be for the State of Alabama. I will let you know once I have this information.

We look forward to speaking next week.

David

David L. Gordon

Senior Counsel

Environment and Natural Resources Division

United States Department of Justice

Regular Mail: PO Box 7611, Washington, DC 20044-7611

Express Mail: ENRD Mailroom - Room 2121, 601 D Street, NW Washington, DC 20004

telephone (202) 514-3659

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david.l.gordon@usdoj.gov

From: Butterfield, Benjamin W. [mailto:BButterfield@mofo.com]
Sent: Wednesday, January 11, 2017 1:18 PM
To: Gordon, David L. (ENRD) <DGordon@ENRD.USDOJ.GOV>
Cc: Marines, Jennifer L. <JMarines@mofo.com>; Frankel, Donald (ENRD) <DFrankel@ENRD.USDOJ.GOV>
Subject: RE: Confidential - Maxus Revised Plan and Disclosure Statement

David,

Could you please provide me with a list of attendees from your end? Just want to make sure that everyone receives the calendar invite.

Thanks,

Ben

Benjamin Butterfield

Morrison & Foerster LLP

250 West 55th Street | New York, NY 10019-9601

O: +1 (212) 336-4157 | M: +1 (510) 304-7176

butterfield@mofo.com | www.mofo.com

From: Marines, Jennifer L.
Sent: Tuesday, January 10, 2017 6:48 PM
To: Gordon, David L. (ENRD)
Cc: McLoughlin, Maeghan J.; Frankel, Donald (ENRD); MAXUS; Maxus; Barry, Joseph; Cleary, M. Blake
Subject: Re: Confidential - Maxus Revised Plan and Disclosure Statement

Jan 17 at 3:30pm ET works on this side.

Jennifer Marines | Partner

Morrison & Foerster LLP

250 West 55th Street | New York, NY 10019

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On Jan 10, 2017, at 5:42 PM, Gordon, David L. (ENRD) <David.L.Gordon@usdoj.gov> wrote:

- External Email -

Jen,

Sorry to put this off another week, but would after 3:30 p.m. on either Tuesday Jan. 17th or Wednesday Jan. 18th work?

David

David L. Gordon

Senior Counsel

Environment and Natural Resources Division

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From: Marines, Jennifer L. [<mailto:JMarines@mofo.com>]
Sent: Wednesday, January 04, 2017 5:56 PM
To: Gordon, David L. (ENRD) <DGordon@ENRD.USDOJ.GOV>
Cc: McLoughlin, Maeghan J. <MMcLoughlin@mofo.com>; Frankel, Donald (ENRD) <DFrankel@ENRD.USDOJ.GOV>; MAXUS <MAXUS@mofo.com>; Maxus <Maxus@zolfocooper.com>; Barry, Joseph <jbarry@ycst.com>; Cleary, M. Blake <mbcleary@ycst.com>
Subject: RE: Confidential - Maxus Revised Plan and Disclosure Statement

Many thanks. We look forward to it.

Jennifer Marines | Partner

Morrison & Foerster LLP

250 West 55th Street | New York, NY 10019-9601

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From: Gordon, David L. (ENRD) [<mailto:David.L.Gordon@usdoj.gov>]
Sent: Wednesday, January 04, 2017 5:54 PM
To: Marines, Jennifer L.
Cc: McLoughlin, Maeghan J.; Frankel, Donald (ENRD); MAXUS; Maxus; Barry, Joseph; Cleary, M. Blake
Subject: RE: Confidential - Maxus Revised Plan and Disclosure Statement

- External Email -

Jen,

A call next week would work better for us. We'll get back in touch to propose a day and time. Thanks,

David

David L. Gordon

Senior Counsel

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From: Marines, Jennifer L. [<mailto:JMarines@mofo.com>]
Sent: Tuesday, January 03, 2017 11:42 AM
To: Gordon, David L. (ENRD) <DGordon@ENRD.USDOJ.GOV>
Cc: McLoughlin, Maeghan J. <MMcLoughlin@mofo.com>; Frankel, Donald (ENRD) <DFrankel@ENRD.USDOJ.GOV>; MAXUS <MAXUS@mofo.com>; Maxus <Maxus@zolfocooper.com>; Barry, Joseph <jbarry@ycst.com>; Cleary, M. Blake <mbcleary@ycst.com>
Subject: Re: Confidential - Maxus Revised Plan and Disclosure Statement

David and Don -

Happy and healthy New Year.

Now that you've hopefully had some time to review changes to the plan that was filed last week, should we touch base with a call later this week (Thursday or Friday) or early next week (Monday or Tuesday)?

Jen

Jennifer Marines | Partner

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On Dec 30, 2016, at 12:54 PM, Gordon, David L. (ENRD) <David.L.Gordon@usdoj.gov> wrote:

- External Email -

Maeghan,

Thank you for sending the redline, and we see that the proposed Plan and Disclosure Statement has now been filed. We look forward to continued discussions regarding the Environmental Response Trust and alternatives for ownership of the properties in the event a YPF settlement does not occur.

David

David L. Gordon

Senior Counsel

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From: McLoughlin, Maeghan J. [<mailto:MMcLoughlin@mofo.com>]

Sent: Wednesday, December 28, 2016 12:17 PM

To: Gordon, David L. (ENRD) <DGordon@ENRD.USDOJ.GOV>; Frankel, Donald (ENRD) <DFrankel@ENRD.USDOJ.GOV>

Cc: MAXUS <MAXUS@mofo.com>; Maxus <Maxus@zolfocooper.com>; Barry, Joseph <jbarry@ycst.com>; Cleary, M. Blake <mbcleary@ycst.com>

Subject: Confidential - Maxus Revised Plan and Disclosure Statement

CONFIDENTIAL

SUBJECT TO FRE 408

David and Don –

Thank you for taking the time to speak with us last week about the draft plan. Attached are further revised drafts of the Debtors' plan of liquidation and disclosure statement that incorporate comments from different parties-in-interest that we have received since last week, as well as redlines against the versions sent to you on December 22.

We intend to file these documents on Thursday, December 29.

Please note that these remain subject in all respects to further internal and client review and comment. We are sending copies simultaneously to Chadbourne (YPF), Akin (Retiree Committee), and Schulte (Creditors' Committee).

Best,

Maeghan

Maeghan McLoughlin

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